

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA
ex rel. JANE ROLLINSON
and DANIEL GREGORIE,

Plaintiffs,

v.

BRIGHTON MARINE, INC., et al.,

Defendants.

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Case No. 2:16-cv-00447-LEW

JOINT STATUS REPORT

Plaintiff, the United States, and Defendants, Brighton Marine, Inc., CHRISTUS Health, The Johns Hopkins Medical Services Corporation, Martin’s Point Health Care, Inc., PacMed Clinics, Saint Vincent Catholic Medical Centers of New York, and US Family Health Plan Alliance, LLC (collectively, “Defendants”), hereby jointly submit this status report:

1. The parties filed a Joint Motion to Stay All Deadlines Pending Completion of Mediation on May 10, 2024. (ECF No. 123).

2. The Court granted the Joint Motion to Stay and instructed the parties to file a status report on or about August 16, 2024. (ECF No. 124). The parties are filing this Joint Status Report in response to the Court’s Order.

3. The parties participated in a mediation session with mediator Hon. Janice M. Symchych (Ret.) on August 6-7, 2024.

4. The parties did not reach a settlement agreement during mediation, but most Defendants are continuing to engage in settlement discussions following the mediation sessions with the assistance of mediator Symchych.

5. To avoid the burden and expense of motion practice while engaged in continuing settlement discussions and in the interest of judicial efficiency, the parties wish to extend the stay of deadlines in this matter and propose a deadline by which Defendants will jointly respond to the Complaint in Intervention.

6. Defendants intend to jointly respond to the Complaint in Intervention if settlement discussions are not successful (in addition to one anticipated motion that applies only to one defendant). Thus, to avoid certain defendants filing motions to dismiss individually while other defendants continue settlement discussions, the parties propose staying the deadlines for all Defendants while those settlement discussions continue.

7. The parties propose that they provide a joint status report to the Court in thirty (30) days, by September 16, 2024, updating the Court on the status of the continuing settlement discussions. If settlement discussions are unsuccessful, Defendants will respond to the Complaint in Intervention by October 7, 2024. If any defendant files a motion to dismiss the Complaint in Intervention, the United States will have until November 25, 2024, to file its response. Any moving defendant will then have until January 6, 2025, to file its reply.

8. The parties are prepared to submit a joint motion to request the extension proposed herein should the Court deem it necessary and appropriate.

Respectfully submitted,

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Dated: August 16, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2024, I served a true and correct copy of the foregoing document via the Court's Electronic Filing System, which will electronically send notice to all counsel of record.

/s/ Julia G. Pitney

Julia G. Pitney